



COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL RESOURCES

-Please note our new name-
DEPARTMENT OF ENVIRONMENTAL PROTECTION
D E P

Rachel Carson State Office Building
P.O. Box 8468
Harrisburg, PA 17105-8468
January 29, 1996

(717) 787-9256

Bureau of Air Quality

Mr. Michael Markowski
Permit Section
Region III
U.S. Environmental Protection Agency
841 Chestnut Building
Philadelphia, PA 19107-4431

EPA, REGION III

Dear Mike:

Enclosed is the "clean copy" of the Implementation Agreement for Pennsylvania's Title V Operating Permits Program signed by James Salvaggio, Director, Bureau of Air Quality, Department of Environmental Protection. As I understand it, you will return to me a "fully executed" copy of the IA. Please note that I have revised, as per your request, the Table of Contents of the IA to include the attachment of the Acid Rain Permit Writer's Guidance as "Appendix B".

Your assistance in completing the approval process for Pennsylvania's Title V Operating Permits Program is greatly appreciated. Please call me at the telephone number shown above if further discussion of matters pertaining to the Title V program is necessary.

Sincerely,

John F. Slade
Chief
Division of Permits

Enclosure

cc: James Salvaggio
William C. Smith, Esq.
Joyce E. Epps, Esq.

IMPLEMENTATION AGREEMENT
BETWEEN
PENNSYLVANIA DEPARTMENT OF ENVIRONMENTAL PROTECTION
AND
U.S. ENVIRONMENTAL PROTECTION AGENCY
REGION III
Title V OPERATING PERMITS PROGRAM

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I. GENERAL

- A. This implementation agreement (IA) defines additional policies, responsibilities, and procedures by which the air operating permits program will be administered by both the Pennsylvania Department of Environmental Protection and the United States Environmental Protection Agency, Region III. This IA clarifies responsibilities and commitments made by DEP in its Title V program submittal and in its implementing regulations. This IA also defines policies, responsibilities, and procedures associated with implementation of the Section 112 air toxics program.
- B. With regard to Section 112(1), the purpose of this agreement is to describe a formal procedure of cooperative information-sharing that will facilitate federal delegation of authority to implement and enforce standards promulgated by the EPA under Section 112 of the Clean Air Act (Act). This agreement will clarify the responsibilities of both DEP and EPA Region III to ensure that all Section 112 requirements are implemented and enforced as applicable requirements of the Title V operating permits program.
- C. This IA is entered into by the Pennsylvania Department of Environmental Protection (hereinafter "DEP") and the Air, Radiation & Toxics Division of EPA Region III (hereinafter "EPA"). Each party is responsible for ensuring that its obligations under Part 70 and Title V of the Act are met accordingly. Both parties agree to maintain a sufficient level of communication, cooperation, and coordination between their respective staffs to assure successful and effective administration of the operating permits program. Both parties also agree to maintain a list of contact persons involved with implementation of the permits program and the air toxics program.
- D. This IA may be modified only after mutual consent of both parties for any purpose. The parties to this agreement affirm their commitment to an effective Commonwealth/EPA partnership and agree to review this commitment on an annual basis, or as the need arises. Any revisions or modifications to this IA must be in writing and must be signed by the Department and EPA. DEP and EPA agree to meet as necessary to discuss program implementation and discuss specific issues that need resolution. The strategies and priorities for issuance, compliance monitoring and enforcement of permits, as established in this IA, will be set forth in more detail in the annual Section 105 program plan and the DEP/EPA Enforcement Agreement.
- E. Nothing in this IA shall be construed to restrict in any way EPA's authority to fulfill its oversight and enforcement

responsibilities under the Clean Air Act. Nothing in this IA shall be construed to contravene any provision of Part 70. This IA is in addition to, and does not contravene, the Enforcement Memorandum of Understanding between EPA and Pennsylvania.

II. PROGRAM IMPLEMENTATION

- A. DEP and EPA each agree to notify the other as early as possible of any problems anticipated with any permit or permit application, such as anticipated public controversy, complex equivalency determinations, or trading provisions.
- B. DEP agrees to do the following:
 - 1. Maintain information, updated as necessary, in the Aerometric Information Retrieval System (AIRS) Facility Subsystem (AFS) on Title V sources.
 - 2. Maintain an adequate public file at the appropriate DEP Regional or Central offices (accessible for EPA review) for each permittee. The file must include the permit application (including the compliance plan), the issued permit, a record of the public notice procedures the permit has undergone, a record of the commenters and the issues raised during the public participation process, compliance and monitoring reports, inspection reports, compliance certifications, enforcement actions, revisions to permits and applications for revisions, and other pertinent information and correspondence.
 - 3. If requested by EPA, provide an accounting demonstrating how revenue from required permit fees was collected and spent by the permitting authority, and to demonstrate that required fee revenues are used solely to cover the costs of meeting the various functions of the permitting program. If necessary, DEP shall modify the permit fee system to ensure that it covers all reasonable direct and indirect costs of administering the program as the costs change over time.
 - 4. Maintain legal authority and resources needed for effective implementation and enforcement of all applicable requirements through the permit process.
 - 5. Where the program contains a demonstration and/or commitment to adopt authority for and implement future applicable requirements (e.g., future MACT standards, acid rain requirements), DEP will automatically implement each new requirement unless it informs EPA to the contrary.

6. Process in a timely manner and propose to issue, reissue, or modify all Title V permits including general permits. Permit applications by major source emitters shall receive first priority, where justified, based on air quality and public health considerations. DEP shall also develop reasonable procedures to give priority, where practicable, to applications for construction or modification under an EPA-approved preconstruction review program.

C. The EPA agrees to do the following:

1. Provide technical support, assistance and training opportunities, as available, for interpretation of national regulations, development of technology-based requirements, and automated transmission of permit data to EPA in an AIRS/AFS compatible format. Such support will include general technical assistance in determining appropriate permit conditions and processing permits, and other areas as requested by DEP.
2. Communicate with DEP when additional legal, technical, and financial resources may be necessary to implement new requirements as they become applicable.
3. Cooperate with DEP by allowing appropriate flexibility when determining the most effective and expeditious means of implementing EPA policies and guidance.
4. Provide DEP with the opportunity for involvement and input into new program activities or initiatives (e.g., national workgroups).
5. Provide DEP with copies of policy memos, interpretations, and guidance documents received from EPA Headquarters. These will be sent as soon as possible or in a timely manner on a monthly basis. EPA will furnish to DEP the information in its files that DEP needs to implement its approved program. Any such information submitted to EPA under a claim of confidentiality will be subject to the regulations of 40 CFR Part 2.

D. DEP and EPA agree that EPA will assess DEP's administration of the operating permits program on an annual basis for consistency with Title V, 40 CFR Part 70, and all other requirements of the Act.

1. In assessing the program, the EPA may consider written comments that are received from regulated persons, the public, and Federal, Commonwealth, and local agencies.

EPA will provide copies of any comments received from such sources to DEP as soon as practicable after receipt.

2. The EPA will assess the permits program by examining DEP's files and documents for selected facilities to determine whether permits are processed, issued, reopened, revised, renewed, and enforced in a manner consistent with Federal requirements.
3. If EPA determines that DEP is not adequately administering or enforcing the program, EPA will notify DEP of the determination as soon as possible and the reasons for it. DEP and EPA will then determine the process and timeframe for correcting the program deficiencies in an expeditious manner, pursuant to 40 CFR Part 70.10(b).
4. To ensure effective program assessment, DEP agrees to allow EPA access to all files and other requested information deemed necessary by EPA for reviewing program administration and enforcement.

III. PERMIT REVIEW AND ISSUANCE

A. DEP agrees to do the following:

1. Work with EPA, as needed, to determine which proposed permits need to be reviewed by EPA prior to the beginning of the public comment period and make those proposed permits available to EPA.
2. Upon request, submit to EPA an update on the permitting actions DEP will process to meet the one-third requirement for the first 3 years of program implementation. This will assist DEP and EPA in targeting specific permits for full EPA review.
3. In each Title V permit, specify and refer to the origin of and authority for each permit term or condition, and identify any difference in form from the applicable requirement upon which the term or condition is based.
4. Provide permit materials and information to EPA in accordance with Section IV, below.
5. Not issue a proposed permit if EPA objects to its issuance in writing within 45 days of EPA's receipt of the proposed permit and all necessary supporting information. DEP shall not issue the permit until EPA withdraws its objection as provided in III.B.1.c.,

below.

6. Notify EPA in writing of "material substantive changes" that DEP has made, or intends to make, to the proposed permit (i.e., the permit provided to EPA for review pursuant to 25 Pa. Code Sec. 127.522) on the basis of public or affected state comment. If EPA objects in writing to the issuance of the proposed permit within 45 days of receipt of such notice, DEP shall not issue the permit. If the permit has already been issued, DEP shall revoke the permit as soon as practicable (but not more than 20 days) after receipt of EPA's objection.
7. Notify EPA in writing whenever DEP intends to terminate an issued Title V permit and transmit a copy of any permit which is proposed to be modified, or revoked and reissued, to EPA with any proposed changes clearly identified. The procedures set forth in Section III and IV relating to EPA review shall be followed with respect to DEP modifications of any issued permit.
8. If the terms of any permit are affected in any manner by administrative or court action, DEP shall immediately notify EPA of the revision and shall immediately transmit a copy of the permit, with changes identified, to EPA. Where DEP is required to modify the permit, the procedures set forth in Section III and IV relating to EPA review shall be followed with respect to DEP modifications of any issued permit in response to administrative or court action.

B. The EPA agrees to do the following:

1. Provide comments or objections to proposed permits in an expeditious manner, but no later than 45 days from receipt of the proposed permit and the necessary supporting material (including review memorandum and statement of basis).
 - a. Include with any objection a statement of the reasons for objection and description of the terms and conditions that must be included in the permit to respond to the objection. EPA will provide a copy of the objection to the permit applicant.
 - b. Issue or deny the permit if DEP fails to submit a revised permit for review within 90 days after receipt of an objection, as provided in 40 CFR 70.8(c)(4).
 - c. Withdraw its objection when satisfied that DEP has

resolved the basis for the objection and provide a copy of the withdrawal to the permit applicant.

2. Work with DEP, as needed, to identify which proposed permits will be reviewed by EPA prior to the beginning of the public comment period. EPA will make comments on those permits within 30 days from receipt, except where a longer review is needed as agreed to by DEP. If necessary, DEP and EPA will negotiate EPA's review period on a case-by-case basis.
3. If a public petition is received under 40 CFR Part 70.8(d), EPA agrees to:
 - a. Notify DEP and permit applicant that a public petition was received and provide a copy of the petition within 7 working days of receipt.
 - b. Grant or deny the public petition within 60 days and provide a copy of the determination to DEP and the permit applicant.
- C. For purposes of this agreement, DEP and EPA agree that "material substantive changes" to a proposed permit are changes that:
 1. make emission limitations or performance requirements less stringent;
 2. make monitoring, recordkeeping, or reporting requirements less stringent;
 3. extend the time for compliance with any applicable requirement; or,
 4. result in a change in the compliance demonstration or test methods specified in the proposed permit.

IV. SUBMITTAL OF INFORMATION

- A. DEP agrees to submit to EPA operating permit information as specified below.
 1. DEP will submit permit information to EPA via the following electronic mechanism. If such information cannot be converted into an electronic format, DEP will submit the information to EPA via hard (paper) copy.

[State should select at least one of the following:

- a. Diskette - The State agrees to submit electronic files on 3.5" diskettes, formatted in DOS, clearly

labeled, mailed to EPA;

- b. Modem upload - The State agrees to upload electronic files via modem to EPA;
- c. EPA remote access - The State agrees to provide remote computer access to EPA. Additionally, the State agrees to install necessary software on their computer system in order for EPA to browse electronic files. The State will also provide software (e.g., electronic mail) which officially notifies EPA of proposed permits posted on the computer system.]

- 2. DEP will provide all electronic files in an EPA-compatible format. Word processing documents should be provided in WordPerfect or ASCII format; scanned images in TIFF4 graphics format; and spreadsheets in Lotus 1-2-3 format.
- 3. Upon request, DEP will submit to EPA a hard copy of any permit application, proposed permit, or other permit information.

B. DEP agrees to submit permit information according to the following process:

- 1. For those permits that EPA identifies for conducting a full review (to be determined by EPA), DEP agrees to submit to EPA the following information in both electronic and hard copy format:
 - a. Permit application will be submitted once DEP has made a completeness determination.
 - b. Proposed permit will be submitted, whenever practicable, at least five (5) working days prior to the date that it is made available for public comment. On a case-by-case basis, DEP may submit the proposed permit at the time it is made available for public comment. Submission of the proposed permit, either prior to or at the time of public notice, shall be accompanied by a copy of the review memorandum or statement of basis for each facility. A copy of the public notice shall be submitted to EPA when published. Each submittal shall be accompanied by a new source determination under the requirements of the New Source Review (NSR) program or the Prevention of Significant Deterioration (PSD) program, if applicable.

- c.. Final permit will be submitted upon issuance. If no material substantive changes have been made in the proposed permit previously provided to EPA, DEP may so notify EPA in place of submitting the final permit (unless EPA requests the final permit).
 - d. DEP will also submit any significant public comments that were received on the proposed permit and a summary of how the proposed permit was changed to respond to those comments.
 - 2. For permits other than those specified in B.1 above, DEP agrees to submit to EPA the following information in electronic format, and agrees to submit a hard copy as well if requested by EPA:
 - a. Permit application summary form (Attachment A) will be submitted once it is completed, but not later than the date the proposed permit is issued.
 - b. If requested by EPA, a copy of the proposed permit will be submitted once it is made available for public comment.
 - c. Final permit will be submitted once it is issued. If no material substantive changes have been made in the proposed permit previously provided to EPA, DEP may so notify EPA in place of submitting the final permit (unless EPA requests the final permit). **[If submitted electronically, DEP will notify EPA on a weekly basis (batches) of proposed permits that have been posted electronically].**
 - d. DEP will also submit any significant public comments that were received on the proposed permit and a summary of how the proposed permit was changed to respond to those comments.
- C. If information provided to EPA has been submitted to the Commonwealth under a claim of confidentiality, DEP shall clearly identify such claim when providing the information. Any information obtained from the Commonwealth and subject to a claim of confidentiality shall be treated by EPA in accordance with applicable regulations in 40 CFR Parts 2 and 70.4(j)(1), and 35 P.S. Section 4013.2 (to the extent consistent with 40 CFR Parts 2 and 70.4(j)(1)).

V. DATA MANAGEMENT

- A. DEP agrees to submit the following permit program data

elements (PPDE) to EPA via AIRS. These PPDE are required on a national basis. DEP will enter this information into AIRS on at least a monthly basis.

1. Permitting authority name
 2. AFS plant identification number
 3. Permit number assigned by DEP
 4. New permit or modification
 5. Date final permit issued
- B. EPA agrees to enter into AIRS, on a bi-weekly basis, the following PPDE's for each Title V source, if applicable:
1. Date EPA receives proposed permit
 2. Date that the 45-day review clock expires (computer generated)
 3. Date EPA objects to a permit
 4. Date EPA receives revised proposed permit
 5. Date EPA denies a revised permit
 6. Date EPA receives public petition
 7. Date EPA responds to the public petition

VI. PROGRAM REVISIONS

- A. DEP agrees to do the following to assure proper revision of its approved operating permits program:
1. Take appropriate and timely actions to ensure the expeditious adoption of any necessary legislation and/or regulations and take other actions as necessary to preserve and maintain the approval status of the permitting program, including the adoption of new federal authorities and applicable requirements within the required time frame established under 40 CFR Part 70.
 2. To the extent practicable, notify EPA 30 days in advance of, and transmit the text of, any proposed change in the program (e.g., proposed changes in permit regulations, statutes, local ordinances, resource/funding demonstrations, transfer of program to another agency).
 3. Submit program revisions to EPA within 30 days of adoption.
- B. DEP and EPA agree that, in accordance with 40 CFR Part 70.4(i), operating permits program revisions become effective only upon approval by the EPA as follows:

1. For substantial program revisions, EPA approval must be processed according to the public notice provisions of 40 CFR Part 70.4(i).
 2. For nonsubstantial program revisions (as defined by EPA), EPA approval may be given by a letter to the Governor (or designee).
- C. The EPA agrees to do the following to assure proper review and approval of program revisions:
1. Expeditioniously review and appropriately respond to all information submitted by DEP within the required time frames.
 2. Provide for public notice of at least 30 days and final action in the Federal Register within the time frames established in 40 CFR Part 70.4(i) of any substantial program revisions submitted by the permit agency or initiated by the EPA.
 3. Maintain and make available to DEP a list of available Title V Operating Permit Program guidelines.

VII. ENFORCEMENT

DEP and EPA agree to comply with existing memoranda of agreement and Section 105 grant commitments with respect to enforcement of Title V permit requirements. The parties further agree to review and, if appropriate, revise these memoranda and commitments based on the parties' experience with the Title V program.

VIII. TITLE IV INTERFACE

DEP agrees to accept delegation of the applicable provisions of 40 C.F.R. Parts 70, 72, and 78 for the purpose of implementing the Title IV (Acid Rain) requirements of the Title V operating permit program. DEP shall apply such provisions for purposes of incorporating Acid Rain program requirements into each affected source's operating permit; identifying designated representatives; establishing permit application deadlines; issuing, denying, modifying, reopening, and renewing permits; establishing compliance plans; processing permit appeals; and issuing written exemptions under 40 C.F.R. §§ 72.7 and 72.8. To the extent that any requirements of Parts 72 and 78 are inconsistent with the requirements of Part 70, Parts 72 and 78 shall take precedence and shall govern the issuance, denial, modification, reopening, renewal, and appeal of the Acid Rain portion of an operating permit. The provisions of 40 C.F.R. Part

70 and Part 72, Subpart G applicable to the Acid Rain permit applications and draft, proposed, and final Acid Rain permits shall also apply to petitions for exemption and draft, proposed, and final written exemptions respectively for new or retired units to the extent consistent with 40 C.F.R. §§ 72.7 and 72.8.

DEP agrees to receive and perform completeness and substantive reviews of acid rain permit applications, as well as issue all Phase II acid rain permits by December 31, 1997, in accordance with EPA's acid rain permit writer's guidance (Attachment B). Pennsylvania shall enforce the provisions of all issued acid rain permits.

IX. SECTION 112 PROGRAM TRANSITION AND INTERFACE

- A. **General:** DEP, through this IA and its Title V operating permit program submittal, provides a description of the DEP's commitment to accept delegation, implement, administer and enforce 42 U.S.C. 7412 (§112 Maximum Achievable Control Technology (MACT) standards), and the DEP's mechanism for accepting delegation and implementing future §112 MACT standards and infrastructure programs.

Upon approval of DEP's Title V program, DEP will assume responsibility for implementing, administering and enforcing §112 MACT standards for Title V sources within Pennsylvania.

- B. **Early Implementation:** "Early implementation" refers to the time period after Title V program approval, but before EPA has granted delegation under Section 112(l) for specific MACT standard(s) and/or infrastructure program(s). During the early implementation period, DEP agrees to:
1. Identify, and when deemed appropriate, notify sources subject to new rules;
 2. Accept and track notification forms, reports, etc., submitted by subject facilities;
 3. Request that EPA take enforcement action against violators until state enforcement authority is established; and
 4. Implement promulgated federal programs and standards until such time as any modified state program or standard is approved by EPA pursuant to §112(l).
- C. **Mechanism for Accepting Delegation of Section 112 Standards and Infrastructure Programs:**

For Title V sources, DEP seeks approval of a program for delegation of unchanged §112 MACT standards and infrastructure programs under the authority of §112(1) as part of its Title V program approval. EPA and DEP further agree that, upon EPA's approval of Pennsylvania's Title V program, DEP will accept delegation of §112 MACT standards applicable to only Title V sources within Pennsylvania and that DEP will implement and enforce existing §112 MACT standards and infrastructure programs in compliance with the requirements established by EPA pursuant to the federal Clean Air Act.

For existing and, when promulgated, future §112 MACT standards and infrastructure programs, EPA will notify DEP by forwarding to DEP a copy of the applicable regulations with a mutually agreed upon standardized checklist. By checking the appropriate boxes and returning the checklist to EPA with a letter from the Director of Air Quality, DEP will indicate whether each proposed §112 MACT standard is applicable to a source in Pennsylvania and whether DEP intends to request delegation. Delegation of a §112 MACT standard will be final on the date that EPA publishes an informational notice in the Federal Register announcing that delegation has been granted (DEP will receive an advance copy prior to publication).

D. Specific Section 112 Requirements:

1. Section 112 General Provisions - 40 CFR Part 63 (Subpart A): DEP commits to accepting delegation and implementing for all affected sources the regulatory requirements consistent with the §112 general provisions, 40 CFR Part 63, subpart A.
2. Section 112(d) MACT Standards: Upon promulgation of a federal standard, DEP will be administratively responsible for receiving all source notifications, monitoring data, records and reports, etc., specified by the §112 MACT standard. While DEP commits to accepting delegation, until formal delegation occurs, EPA Region III will also receive administrative notifications, monitoring data, records and reports, etc., unless EPA Region III and DEP agree that DEP will assume administrative responsibility for these notifications prior to formal delegation.
3. Section 112(g) Program for Modified/Constructed and Reconstructed Major Toxic Sources: Upon issuance of the final rule by EPA and EPA's approval of Pennsylvania's Title V program, DEP commits to accepting delegation and making a case-by-case MACT determinations for modified, constructed, or reconstructed major toxic sources required under §112(g), consistent with EPA

rules and applicable guidance documents and for incorporating them into the operating permit as applicable requirements. DEP commits to reporting case-by-case determinations to the national database (when operational).

4. Section 112(i)(5) Early Reductions Program: DEP agrees to accept delegation and process applications for early reductions compliance extensions under §112(i)(5) in accordance with 40 C.F.R. Part 63, subpart D and issue Title V permits containing such compliance extensions and associated alternative emission limits.
5. Section 112(j) MACT Hammer: DEP commits to accepting Title V permit applications for a category or subcategory of sources promulgated under §112(c) beginning eighteen (18) months after EPA fails to promulgate a §112 MACT standard according to EPA's schedule for such action. These applications shall be reviewed and approved consistent with DEP's Title V program. Permits issued pursuant to 112(j) shall contain emission limitations for hazardous air pollutants that, on a case-by-case basis, are determined to be equivalent to the emission standard that would have been promulgated under 112(d): DEP commits to reporting case-by-case determinations to the national database (when operational). EPA Region III agrees to provide technical assistance to DEP in making case-by-case MACT determinations for sources subject to §112(j).
6. Section 112(r) Accidental Release Program: For Title V sources, DEP agrees that "applicable requirements" (as defined in 40 CFR § 70.2 and 25 Pa. Code § 121.1) include any standard or other requirement under Section 112(r) of the federal Clean Air Act (42 U.S.C.A. § 7412) and the regulations thereunder, including a requirement concerning accident prevention in Section 112(r)(7). DEP acknowledges and understands that each Title V Permit issued to a Title V facility will contain the following:
 - A. A permit condition requiring the permittee to certify that the RMP is accurate and complete in accordance with guidance (including a checklist addressing the required elements of a complete RMP) developed by EPA
 - B. A permit condition requiring that the permittee submit the RMP to DEP, and other information requested by the Department concerning the RMP.

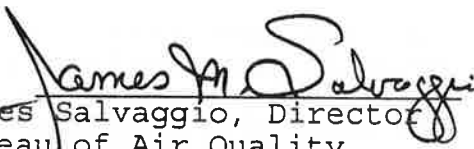
- C. If necessary, a schedule of compliance for submittal of a complete RMP and verification of completeness.
- D. A permit condition that the permittee is subject to appropriate enforcement action by the DEP for failure to comply with the accidental release program requirements of Section 112(r) of the federal Clean Air Act.
- E. Any other permit conditions necessary to comply with the requirement of 25 Pa. Code § 127.512(i) that the permittee develop an accidental release program consistent with the requirements of the federal Clean Air Act and regulations adopted thereunder.

EPA Region III will provide technical assistance and guidance (including a checklist which addresses the elements of a complete RMP) to the DEP. Upon issuance of the checklist by EPA, DEP commits to providing the RMP checklist to Title V sources to assist the owners or operators of said sources in the preparation of RMPs which satisfy the requirements of Section 112(r) and applicable regulations adopted thereunder.

As provided in Section 112(r)(1), nothing in this Implementation Agreement or Section 112(r) of the federal Clean Air Act shall be interpreted, construed, implied, or applied to create any liability or basis for compensation for bodily injury or any other injury or property damages to any person which may result from accidental release of such substances.

X. Signatures:

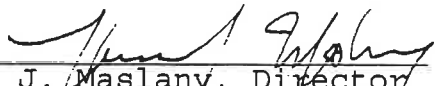
Pennsylvania Department of Environmental Protection

By: 
James Salvaggio, Director
Bureau of Air Quality
Commonwealth of Pennsylvania
Department of Environmental Protection

Date:

1/31/96

U.S. Environmental Protection Agency, Region III

By: 
Thomas J. Maslany, Director
Air, Radiation & Toxics Division
United States Environmental Protection Agency
Region III

Date: 2/15/96

